

through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, as follows:

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Description</u>
63.	Mar. 4, 2014	\$6,450.00	U.S. Bank (x1165) to S.B. (web developer in India)
64.	Aug. 5, 2016	\$5,005,732.86	Ad Tech B.V. (Netherlands) to Cereus Properties (x6211)
65.	Sept. 22, 2016	\$2,916,955.00	Ad Tech B.V. (Netherlands) to Cereus Properties (x6211)
66.	Oct. 3, 2016	\$354,050.84	Ad Tech B.V. (Netherlands) to Cereus Properties (x6211)
67.	Nov. 2, 2016	\$2,726,170.00	Ad Tech B.V. (Netherlands) to Cereus Properties (x6211)
68.	Nov. 15, 2016	\$351,403.54	Ad Tech B.V. (Netherlands) to Cereus Properties (x6211)

In violation of 18 U.S.C. § 1956(a)(2)(A).

COUNTS 69-99

(Transactional Money Laundering)

208. The factual allegations in Paragraphs 1-207 are incorporated by reference and re-alleged as though fully set forth herein.

209. On or about the dates set forth below, each instance constituting a separate count of this Superseding Indictment, in the United States and in the District of Arizona and elsewhere, the specified defendant, and others known and unknown to the grand jury, knowingly engaged and attempted to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and is derived from specified unlawful activity, as follows:

Case 2:18-cr-00422-SPL Document 230 Filed 07/25/18 Page 59 of 92

<u>Count</u>	<u>Defendant</u>	<u>Date</u>	<u>Amount</u>	<u>Description</u>
69.	LACEY, BRUNST	Aug. 21, 2013	\$30,000.00	Bank of America (x1793) to Stewart Title (partial payment for Sedona property)
70.	LACEY, BRUNST	Sept. 13, 2013	\$62,491.47	BMO Harris to Stewart Title (partial payment for Sedona property)
71.	SPEAR	June 11, 2014	\$300,000.00	National Bank of Arizona (x0178) to Spear Family Trust
72.	SPEAR	June 20, 2014	\$200,000.00	National Bank of Arizona (x0178) to TD Ameritrade
73.	SPEAR	Nov. 4, 2014	\$1,000,000.00	National Bank of Arizona (x0178) to UBS Financial
74.	SPEAR	May 14, 2015	\$250,000.00	National Bank of Arizona (x0178) to Lincoln National Life
75.	SPEAR	May 26, 2015	\$50,000.00	National Bank of Arizona (x0178) to Industrial Property Trust
76.	SPEAR	Nov. 3, 2015	\$300,000.00	National Bank of Arizona (x0178) to Ally Bank
77.	SPEAR	Dec. 1, 2015	\$200,000.00	National Bank of Arizona (x0178) to Wells Fargo
78.	SPEAR, BRUNST	Jan. 11, 2016	\$133,045.00	Cereus Properties (x6211) to National Bank of Arizona (x0178)

79.	BRUNST	Jan. 26, 2016	\$101,974.00	Cereus Properties (x6211) to Wells Fargo (x4891)
80.	LARKIN, BRUNST	Feb. 3, 2016	\$1,507,944.00	Cereus Properties (x6211) to Charles Schwab
81.	LACEY, BRUNST	Mar. 1, 2016	\$1,692,020.00	Cereus Properties (x6211) to Bank of America (x5554)
82.	BRUNST	Apr. 1, 2016	\$220,944.00	Cereus Properties (x6211) to Wells Fargo (x4891)
83.	LACEY, BRUNST	June 27, 2016	\$397,9500.00	Arizona Bank & Trust (x1793) to Fidelity Title (partial payment for San Francisco property)
84.	LACEY, BRUNST	July 20, 2016	\$12,859,152.57	Arizona Bank & Trust (x1793) to Fidelity Title (partial payment for San Francisco property)
85.	SPEAR	July 22, 2016	\$50,000.00	National Bank of Arizona (x0178) to Strategic Storage Trust II
86.	LACEY, BRUNST	Aug. 2, 2016	\$16,243.00	Cereus Properties (x6211) to Wells Fargo (x0495)
87.	LARKIN, BRUNST	Oct. 6, 2016	\$1,206,356.00	Cereus Properties (x6211) to Charles Schwab (x4693)
88.	LACEY, BRUNST	Oct. 6, 2016	\$268,016.00	Cereus Properties (x6211) to Arizona Bank & Trust (x1967)
89.	LACEY, BRUNST	Oct. 6, 2016	\$268,016.00	Cereus Properties (x6211) to Arizona Bank & Trust (x1972)
90.	LACEY, BRUNST	Oct. 6, 2016	\$268,016.00	Cereus Properties (x6211) to Arizona Bank & Trust (x1986)

91.	LACEY, BRUNST	Oct. 6, 2016	\$268,016.00	Cereus Properties (x6211) to Arizona Bank & Trust (x1991)
92.	LACEY, BRUNST	Oct. 6, 2016	\$268,016.00	Cereus Properties (x6211) to Arizona Bank & Trust (x2014)
93.	SPEAR, BRUNST	Oct. 6, 2016	\$141,444.00	Cereus Properties (x6211) to National Bank of Arizona (x0178)
94.	LACEY	Dec. 29, 2016	\$3,300,000.00	Arizona Bank & Trust/Dubuque Bank & Trust to Johnson Bank (x9992)
95.	LACEY	Dec. 29, 2016	\$3,300,000.00	Arizona Bank & Trust/Dubuque Bank & Trust to Johnson Bank (x9992)
96.	LACEY	Dec. 29, 2016	\$3,300,000.00	Arizona Bank & Trust/Dubuque Bank & Trust to Johnson Bank (x9992)
97.	LACEY	Dec. 29, 2016	\$3,300,000.00	Arizona Bank & Trust/Dubuque Bank & Trust to Johnson Bank (x9992)
98.	LACEY	Dec. 29, 2016	\$3,300,000.00	Arizona Bank & Trust/Dubuque Bank & Trust to Johnson Bank (x9992)
99.	LACEY	Jan. 3, 2017	\$16,500,000.00	Johnson Bank (x9992) to Primus Trust Co./K&H Bank (Hungary)

In violation of 18 U.S.C. § 1957(a).

COUNT 100

(International Concealment Money Laundering)

210. The factual allegations in Paragraphs 1-209 are incorporated by reference and re-alleged as though fully set forth herein.

211. On or about the date set forth below, in the United States and in the District of Arizona and elsewhere, the specified defendant, and others known and unknown to the grand jury, transported, transmitted, and transferred, and attempted to transport, transmit, and transfer, a monetary instrument and funds from a place in the United States to and through a place outside the United States, and to a place in the United States from and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, as follows:

<u>Count</u>	<u>Defendant</u>	<u>Date</u>	<u>Amount</u>	<u>Description</u>
100.	LACEY	Jan. 3, 2017	\$16,500,000.00	Johnson Bank (x9992) to Primus Trust Co./K&H Bank (Hungary)

In violation of 18 U.S.C. § 1956(a)(2)(B)(i).

FORFEITURE ALLEGATION ONE

[18 U.S.C. 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. The factual allegations in Paragraphs 1-211 are incorporated by reference and re-alleged as though fully set forth herein.

2. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction under Counts 1 through 51 of this Superseding Indictment. Each defendant so convicted shall forfeit to the United States the following:

a. All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense. Such property includes, but is not limited to, the real property located at the following addresses:

1. 10647 N. State Route 89A, Sedona, AZ 86336
2. 1100 Union St. #700, San Francisco, CA 94109
3. 1308 E. 56th Street, 2, Chicago, IL 60637
4. 14, rue Saint Guillaume, Paris, France 75007
5. 2043 Pleasant Hill Rd, Sebastopol, CA 95472
6. 2416 N. Foote Dr., Phoenix, AZ 85008
7. 2531 Tumbleweed Way, Frisco, TX 75034
8. 2755 Fillmore St, San Francisco, CA 94123
9. 3300 E. Stella Lane, Paradise Valley, AZ 85253
10. 3304 E. Stella Lane, Paradise Valley, AZ 85253
11. 3308 E. Stella Lane, Paradise Valley, AZ 85253
12. 3311 E. Stella Lane, Paradise Valley, AZ 85253
13. 3353 Red Robin Road, Pinetop, AZ 85935
14. 343 Presidio Ave, San Francisco, CA 94115

- 1 15. 3516 Estacado Lane, Plano, TX 75025-4432 (Rental)
- 2 16. 493 Zinfandel Lane, Saint Helena, CA 94574
- 3 17. 4931 E. White Gates Drive, Phoenix, AZ 85018
- 4 18. 5245 Evening Sun Dr., Frisco, TX 75034
- 5 19. 5555 North Casa Blanca Drive, Paradise Valley, AZ 85253
- 6 20. 5751 N. 77th Place, Scottsdale, AZ 85250
- 7 21. 5830 E. Calle Del Media (Medio), Phoenix, AZ 85018
- 8 22. 6300 N. 33rd Street, Paradise Valley, AZ 85253
- 9 23. 6314 N. 33rd Street, Paradise Valley, AZ 85253
- 10 24. 7409 Kingsbarns, The Colony, TX 75056
- 11 25. 8604 E. San Ardo Dr., Scottsdale, AZ 85258
- 12 26. 948 Carlsbad Dr., Plano, TX 75023
- 13 Such property also includes, but is not limited to, all funds, securities, and/or other assets
- 14 held in the following bank accounts:
- 15 1. Prosperity Bank account number XXXXX7188
- 16 2. Compass Bank Account number XXXXXX3873
- 17 3. Compass Bank Account number XXXXXX3825
- 18 4. National Bank of Arizona Account number XXXX0178
- 19 5. National Bank of Arizona Account number XXXX0151
- 20 6. National Bank of Arizona Account number XXXX3645
- 21 7. Live Oak Bank Account Number x6910
- 22 8. Ascensus Broker Dealer Services Account Number XXXXX6943-01
- 23 9. Ascensus Broker Dealer Services account Number XXXXX5280-01
- 24 10. First Federal Savings & Loan of San Rafael account number XXXX3620
- 25 11. Republic Bank of Arizona account number XXXX1889
- 26 12. Republic Bank of Arizona account number XXXX2592
- 27 13. Republic Bank of Arizona account number XXXX2500
- 28 14. Republic Bank of Arizona account number XXXX1938

- 1 15. Bank of America Account number XXXXXXXXXXXXXXX8225
- 2 16. Bank of America Account number XXXXXXXXXXXXXXX7054
- 3 17. Bank of America Account number XXXXXXXXXXXXXXX9342
- 4 18. Bank of America Account number XXXXXXXXXXXXXXX0071
- 5 19. San Francisco Fire Credit Union Account Number XXXXXXXXXXXX2523
- 6 20. Ally Bank Account Number XXXXXX6292
- 7 21. Branch Banking and Trust Bank account number XXXXXXXXXXX0218
- 8 22. Green Bank Account number XXX4832
- 9 23. Green Bank Account number XXXXXX4293
- 10 24. Perkins Coie Brokerage Account number xxxxxx7012
- 11 25. Perkins Coie Liquid Assets xxxxxx0012
- 12 26. Alliance Bernstein Brokerage Account number xxxx6878
- 13 27. Alliance Bernstein Brokerage Account number xxxx4954
- 14 28. Alliance Bernstein Brokerage Account number xxxx7892
- 15 29. Alliance Bernstein Brokerage Account number xxxx7888
- 16 30. Alliance Bernstein Brokerage Account number xxxx6485
- 17 31. Republic Bank of Arizona Brokerage Account number xxxx2485
- 18 32. Republic Bank of Arizona Brokerage Account number xxxx1897
- 19 33. Republic Bank of Arizona Brokerage Account number xxxx3126
- 20 34. Republic Bank of Arizona Certificate of Deposit xxxxxx8316
- 21 35. Republic Bank of Arizona Certificate of Deposit xxxxxx8324
- 22 36. Republic Bank of Arizona Certificate of Deposit xxxxxx8332
- 23 37. Republic Bank of Arizona Certificate of Deposit xxxxxx8103
- 24 38. Republic Bank of Arizona Certificate of Deposit xxxxxx8162
- 25 39. Republic Bank of Arizona Certificate of Deposit xxxxxx8189
- 26 40. Paul Hastings LLP Account number xxxxx0457
- 27 41. Global Trading Solutions xxx7177
- 28 42. K&H Bank Account number xxxxxxxxxxxxxxxxxxxxxxx1210

- 1 43. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx5803
- 2 44. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx5801
- 3 45. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx5805
- 4 46. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx2226
- 5 47. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx2231
- 6 48. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx2230
- 7 49. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx4194
- 8 50. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx4196
- 9 51. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx4198
- 10 52. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx8083
- 11 53. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx8086
- 12 54. Fio Bank Account number xxxxxxxxxxxxxxxxxxxxx8080
- 13 55. Bank Frick Account number xxxxxxxxxxxxxxxx LI090x
- 14 56. Bank Frick Account number xxxxxxxxxxxxxxxx LI300x
- 15 57. Bank Frick Account number xxxxxxxxxxxxxxxx LI740x
- 16 58. Bank Frick Account number xxxxxxxxxxxxxxxx LI900x
- 17 59. Knab Bank Account number xxxxxxxxxxxxxxxx7664
- 18 60. Rabo Bank Account number xxxxxxxxxxxxxxxx2452
- 19 61. Rabo Bank Account number xxxxxxxxxxxxxxxx4721
- 20 62. Acacia Conservation Fund Brokerage Account number x2020
- 21 63. Saxo Payments Account number x1262
- 22 64. AS LHV Pank Account number xxxxxxxxxxxxxxxx4431
- 23 65. Bitcoin Wallet -6Lix5 in the amount of 6 BTC
- 24 66. Bitcoin Wallet -6Lix5 in the amount of 199.99995716 BTC
- 25 67. Bitcoin Wallet -6Lix5 in the amount of 404.9984122 BTC
- 26 68. JP Morgan Chase Bank account number xxxxx4455 in the amount of \$699,940
- 27 69. JP Morgan Chase Bank account number xxxxx4455 in the amount of \$106,988.41
- 28 70. JP Morgan Chase Bank account number xxxxx4455 in the amount of \$499,910

- 1 71. JP Morgan Chase Bank account number xxxxx4455 in the amount of \$50,000
- 2 72. Bitcoin Cash Wallet -t8v7e in the amount of 3,673.59306905 BCH
- 3 73. Litecoin Wallet -goaeV in the amount of 16,310.79413202 LTC
- 4 74. Bitcoin Wallet -6Lix5 in the amount of 173.97319 BTC
- 5 75. Bitcoin Cash Wallet -t8v7e in the amount of 55.5 BCH
- 6 76. Bitcoin Wallet -6Lix5 in the amount of 411.00019 BTC
- 7 77. Bitcoin Wallet -6Lix5 in the amount of 2.00069333 BTC
- 8 78. Bitcoin Wallet -6Lix5 in the amount of 136.6544695 BTC
- 9 79. Bitcoin Cash Wallet -t8v7e in the amount of 73.62522241 BCH
- 10 80. Litecoin Wallet -goaeV in the amount of 783.9735116 LTC
- 11 81. Bitcoin Gold Wallet -KK1mJ in the amount of 509.81904619 BTG
- 12 82. Crypto Capital account number x1124
- 13 83. Crypto Capital account number x1933
- 14 84. Any and all bank funds, securities, cryptocurrency, or other assets on deposit or
- 15 seized from an account held at Kraken in the name of Ad Tech BV.
- 16 85. JP Morgan Chase Bank account number xxxxx4155 in the amount of \$42,500
- 17 86. Alliance Bernstein Brokerage account x7889
- 18 87. Alliance Bernstein Brokerage account x0582
- 19 88. Midfirst Bank account x4139
- 20 89. Crypto Capital account number x6886
- 21 Such property further includes, but is not limited to, the following domain names:
- 22 1. admoderation.com (Versio)
- 23 2. admoderators.com (Versio)
- 24 3. adnet.ws (NetNames)
- 25 4. adplace24.com (Versio)
- 26 5. adplaces24.com (Versio)
- 27 6. adpost24.com (Versio)
- 28 7. adpost24.cz (GoDaddy)

- 1 8. adquick365.com (Versio)
- 2 9. adreputation.com (NetNames)
- 3 10. ads-posted-mp.com (Versio)
- 4 11. adsplace24.com (Versio)
- 5 12. adspot24.com (Versio)
- 6 13. adspots24.com (Versio)
- 7 14. adsspot24.com (Versio)
- 8 15. adtechbv.co.nl (NetNames)
- 9 16. adtechbv.com (NetNames)
- 10 17. adtechbv.nl (NetNames)
- 11 18. advert-ep.com (Versio)
- 12 19. adverts-mp.com (Versio)
- 13 20. axme.com (GoDaddy)
- 14 21. back0age.com (NetNames)
- 15 22. backpa.ge (NetNames)
- 16 23. backpagee.com (NetNames)
- 17 24. backpage-insider.com (NetNames)
- 18 25. backpage.adult (NetNames)
- 19 26. backpage.ae (NetNames)
- 20 27. backpage.at (NetNames)
- 21 28. backpage.ax (NetNames)
- 22 29. backpage.be (NetNames)
- 23 30. backpage.bg (European domains)
- 24 31. backpage.bg (NetNames)
- 25 32. backpage.ca (NetNames)
- 26 33. backpage.cl (NetNames)
- 27 34. backpage.cn (European domains)
- 28 35. backpage.cn (NetNames)

- 1 36. backpage.co.id (NetNames)
- 2 37. backpage.co.nl (European domains)
- 3 38. backpage.co.nl (NetNames)
- 4 39. backpage.co.nz (NetNames)
- 5 40. backpage.co.uk (NetNames)
- 6 41. backpage.co.ve (NetNames)
- 7 42. backpage.co.za (NetNames)
- 8 43. backpage.com (NetNames)
- 9 44. backpage.com.ar (NetNames)
- 10 45. backpage.com.au (NetNames)
- 11 46. backpage.com.ph (NetNames)
- 12 47. backpage.cz (NetNames)
- 13 48. backpage.dk (NetNames)
- 14 49. backpage.ec (NetNames)
- 15 50. backpage.ee (European domains)
- 16 51. backpage.ee (NetNames)
- 17 52. backpage.es (NetNames)
- 18 53. backpage.fi (European domains)
- 19 54. backpage.fi (NetNames)
- 20 55. backpage.fr (European domains)
- 21 56. backpage.fr (NetNames)
- 22 57. backpage.gr (European domains)
- 23 58. backpage.gr (NetNames)
- 24 59. backpage.hk (European domains)
- 25 60. backpage.hk (NetNames)
- 26 61. backpage.hu (European domains)
- 27 62. backpage.hu (NetNames)
- 28 63. backpage.ie (NetNames)

- 1 64. backpage.in (NetNames)
- 2 65. backpage.it (NetNames)
- 3 66. backpage.jp (NetNames)
- 4 67. backpage.kr (NetNames)
- 5 68. backpage.lt (NetNames)
- 6 69. backpage.lv (European domains)
- 7 70. backpage.lv (NetNames)
- 8 71. backpage.me (NetNames)
- 9 72. backpage.mx (NetNames)
- 10 73. backpage.my (NetNames)
- 11 74. backpage.net (NetNames)
- 12 75. backpage.nl (NetNames)
- 13 76. backpage.no (European domains)
- 14 77. backpage.no (NetNames)
- 15 78. backpage.nz (NetNames)
- 16 79. backpage.pe (NetNames)
- 17 80. backpage.ph (NetNames)
- 18 81. backpage.pk (NetNames)
- 19 82. backpage.pl (NetNames)
- 20 83. backpage.porn (NetNames)
- 21 84. backpage.pt (NetNames)
- 22 85. backpage.ro (European domains)
- 23 86. backpage.ro (NetNames)
- 24 87. backpage.se (NetNames)
- 25 88. backpage.sex (NetNames)
- 26 89. backpage.sg (NetNames)
- 27 90. backpage.si (European domains)
- 28 91. backpage.si (NetNames)

- 1 92. backpage.sk (European domains)
- 2 93. backpage.sk (NetNames)
- 3 94. backpage.sucks (NetNames)
- 4 95. backpage.tw (NetNames)
- 5 96. backpage.uk (NetNames)
- 6 97. backpage.uk.com (NetNames)
- 7 98. backpage.us (NetNames)
- 8 99. backpage.vn (NetNames)
- 9 100. backpage.xxx (NetNames)
- 10 101. backpage.xyz (NetNames)
- 11 102. backpagecompimp.com (NetNames)
- 12 103. backpagecompimps.com (NetNames)
- 13 104. backpagepimp.com (NetNames)
- 14 105. backpagepimps.com (NetNames)
- 15 106. backpageg.com (NetNames)
- 16 107. backpagm.com (NetNames)
- 17 108. backpagu.com (NetNames)
- 18 109. backpaoe.com (NetNames)
- 19 110. backpawe.com (NetNames)
- 20 111. backqage.com (NetNames)
- 21 112. backrage.com (NetNames)
- 22 113. backxage.com (NetNames)
- 23 114. baklpage.com (NetNames)
- 24 115. bcklistings.com (NetNames)
- 25 116. bestofbackpage.com (NetNames)
- 26 117. bestofbigcity.com (NetNames)
- 27 118. bickpage.com (NetNames)
- 28 119. bigcity.com (NetNames)

- 1 120. bpclassified.com (NetNames)
- 2 121. bpclassifieds.com (NetNames)
- 3 122. carlferrer.com (NetNames)
- 4 123. clasificadosymas.com (NetNames)
- 5 124. clasificadosymas.net (NetNames)
- 6 125. clasificadosymas.org (NetNames)
- 7 126. classifiedsolutions.co.uk (NetNames)
- 8 127. classifiedsolutions.net (NetNames)
- 9 128. classyadultads.com (Versio)
- 10 129. columbusbackpage.com (NetNames)
- 11 130. connecticutbackpage.com (NetNames)
- 12 131. cracker.co.id (NetNames)
- 13 132. cracker.com (NetNames)
- 14 133. cracker.com.au (NetNames)
- 15 134. cracker.id (NetNames)
- 16 135. cracker.net.au (NetNames)
- 17 136. crackers.com.au (NetNames)
- 18 137. crackers.net.au (NetNames)
- 19 138. ctbackpage.com (NetNames)
- 20 139. dallasbackpage.com (NetNames)
- 21 140. denverbackpage.com (NetNames)
- 22 141. easypost123.com (Versio)
- 23 142. easyposts123.com (Versio)
- 24 143. emais.com.pt (NetNames)
- 25 144. evilempire.com (NetNames)
- 26 145. ezpost123.com (Versio)
- 27 146. fackpage.com (NetNames)
- 28 147. fastadboard.com (Versio)